

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Post Office Structure Plan

Docket No. N2012-2

DESIGNATION OF WRITTEN CROSS-EXAMINATION
OF UNITED STATES POSTAL SERVICE

Party

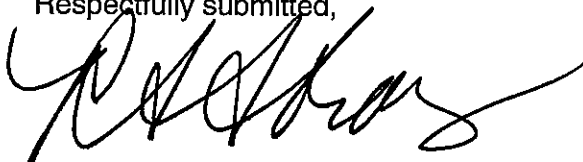
Postal Regulatory Commission

Interrogatories

DBP/USPS-32
PRC/USPS-POIR No.4 - Q5
PRC/USPS-POIR No.5 – Q1-3

Responses of United States Postal Service to
Questions Posed During Oral Cross-Examination
of Witness Day

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ruth Ann Abrams', written over a horizontal line.

Ruth Ann Abrams
Acting Secretary

INTERROGATORY RESPONSES OF
UNITED STATES POSTAL SERVICE
DESIGNATED AS WRITTEN CROSS-EXAMINATION

Interrogatory

Designating Parties

| | |
|--|-----|
| DBP/USPS-32 | PRC |
| PRC/USPS-POIR No.4 - Q5 | PRC |
| PRC/USPS-POIR No.5 - Q1 | PRC |
| PRC/USPS-POIR No.5 - Q2 | PRC |
| PRC/USPS-POIR No.5 - Q3 | PRC |
| Responses of United States Postal Service to Questions Posed During Oral Cross-Examination of Witness Day | PRC |

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN FOLLOW-UP INTERROGATORY**

DBP/USPS-32.

Please refer to your response to Interrogatory DB/USPS-31 subpart [a].

In your response you state that most types of accountable mail may be left in a parcel locker.

[a] Please confirm or explain that the following services are considered to be accountable mail:

1. Express Mail
2. Adult Signature Required
3. Certified Mail
4. Collect on Delivery
5. Restricted Delivery
6. Insurance [over \$200]
7. Registered Mail
8. Return Receipt
9. Return Receipt for Merchandise
10. Signature Confirmation

[b] Please identify any other services that may be considered accountable mail.

[c] Which of the ten listed services in subpart [a] as well as the additional services identified in subpart [b] may be left in a parcel locker without obtaining a signature from the recipient?

[d] May mail which is postage due be left in a parcel locker?

[e] May the mailer of any of the ten listed services in subpart [a] as well as the additional services identified in subpart [b] waive the requirement for obtaining the addressee's signature prior to delivery and if so, are there any conditions under which it may or may not be done?

[f] Are there any of the ten listed services as well as the additional services identified in subpart [b] where the mailer waiving the signature would render the service meaningless such as requesting Signature Confirmation and then waiving the need for a signature on delivery?

[g] Which of the ten listed services in subpart [a] as well as the additional services identified in subpart [b] may the addressee file IN ADVANCE a request for delivery of that category of mail without the need for obtaining a signature?

[h] How will a recipient be made aware of the ability to file IN ADVANCE for receiving that mail without the need to sign for it?

[i] How will the mailer of one of these accountable mail services receive the service that they requested and paid for if the addressee is allowed to waive the need for a signature?

[j] Please provide the data and explain the ability to use the word MOST in your response to the original subpart [a].

**UNITED STATES POSTAL SERVICE
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RESPONSE

Please note as a general matter that this interrogatory requests information regarding policies and procedures currently in effect and that will not change as a result of POSTPlan.

[a]

| | Domestic Product or Service | Accountable Mail (Y/N) | Explanation if (N) |
|-----|--------------------------------|------------------------|--------------------|
| 1. | Express Mail | Yes | |
| 2. | Adult Signature Required | Yes* | |
| 3. | Certified Mail | Yes | |
| 4. | Collect on Delivery | Yes | |
| 5. | Restricted Delivery | Yes* | |
| 6. | Insurance [over \$200] | Yes | |
| 7. | Registered Mail | Yes | |
| 8. | Return Receipt | Yes* | |
| 9. | Return Receipt for Merchandise | Yes | |
| 10. | Signature Confirmation | No | Special Services |

* Considered accountable mail if used in conjunction with Express Mail; Registered Mail; Certified Mail; COD; and Insured Mail.

[b] No other domestic services.

[c] Express Mail with signature waiver.

[d] The carrier will leave Notice PS 3849 in the mail receptacle to notify the customer of postage due with the exact amount of postage needed. The customer can leave the Notice PS 3849 along with the required amount of money in the mail receptacle, and on the rescheduled day, the carrier will leave the postage due article and collect the required amount of postage.

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[e] Only Express Mail with signature waiver can be delivered without a signature.

[f] No.

[g] The customer may leave the signed Notice PS 3849 for all accountable mail types, excluding Return Receipt and Adult Signature Required.

[h] Notice PS 3849 will be left in the customers' mail receptacle.

[i] Only Express Mail with signature waiver authorized by the mailer can be left without a signature. All other types of accountable mail will require a signed Notice PS 3849.

[j] See the responses to subparts [a-i] above. Additionally, the Postal Service based its response on operational experience.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO PRESIDING OFFICER'S
INFORMATION REQUEST NO. 4**

5. The spreadsheet in Library Reference No. 1 (USPS-LR-N2012-2/1) contains columns with various measures of workload (columns V, W, X, Y, Z, AA, AB, AC, AD, AE, AG, AI, AJ) and summary data on Daily Adjusted Earned Workload (columns AK and AL). Please provide an electronic spreadsheet showing how the figures in each of these columns were calculated. For data in each of the columns listed above, please identify the particular cells and columns of the input data files located in the two spreadsheets (SOV_Calc.xls and CVS_Calc.xls) in Library Reference No. 2 (USPS-LR-N2012-2/2).

RESPONSE

The requested information is provided in Library Reference No. 9 (USPS-LR-N2012-2/9). As shown in Library Reference No. 9 (USPS-LR-N2012-2/9), columns X, Y, AA, AB, AC, AD, AE, AG, AI, AJ, AK and AL in Library Reference No. 1 (USPS-LR-N2012-2/1) are calculations based on data from the errata to Library Reference No. 2 (USPS-LR-N2012-2/2). The table below identifies corresponding columns between Library Reference No. 1 (USPS-LR-N2012-2/1) and the spreadsheets from the errata to Library Reference No. 2 (USPS-LR-N2012-2/2).

| USPS-LR-N2012-2/1 | 2011_SOV_Data.xls | 2011_CSV_Data.xls |
|-------------------|-------------------|-------------------|
| V | F | H |
| W | H | N/A |
| Z | I | J |

**RESPONSE OF UNITED STATES POSTAL SERVICE TO PRESIDING OFFICER'S
INFORMATION REQUEST NO. 5**

1. What is the Postal Service's policy with regard to lease negotiations?

RESPONSE

The Postal Service's policy regarding lease negotiations is available in Handbook RE-1, filed as Library Reference USPS-LR-N2012-2/10.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO PRESIDING OFFICER'S
INFORMATION REQUEST NO. 5**

2. How will it balance these factors when it negotiates renewal of leases?

RESPONSE

In the context of lease renewal negotiations, the Postal Service will balance factors consistent with the policies established in Handbook RE-1, filed as USPS Library Reference USPS-LR-N2012-2/10. The Postal Service aims to negotiate a rate that is fair and reasonable and serves the best interest of the Postal Service. As stated by witness Day during oral cross-examination, when negotiating the renewal of leases, the Postal Service will consider changes in the market lease rates applicable to a Post Office location.

REVISED JULY 17, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE TO PRESIDING OFFICER'S
INFORMATION REQUEST NO. 5**

3. If leases cannot be renegotiated in the currently operating facility, what are the Postal Service's plans to avoid suspensions and maintain service in communities where it has committed to ongoing service?

RESPONSE

Postal Service policy provides that suspensions should be avoided, and Section 617 of Handbook PO-101 states that "[w]herever possible ... local management should ... seek to continue operations as long as necessary..." If leases cannot be renegotiated in the currently operating facility, the Postal Service will look for a suitable alternative facility. If a suitable alternative facility cannot be found, a discontinuance study will be initiated.

Consistent with current practice and Handbook PO-101, if a discontinuance study is initiated, the Postal Service will determine an appropriate plan to continue to provide postal services to the impacted community. The Postal Service will select a method for continuing service consistent with section 23 of Handbook PO-101, which requires the maintenance of effective, regular service. The Postal Service has multiple options for providing services to the community, including alternate access channels, nearby retail facilities, carrier service, and a Village Post Office.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO QUESTIONS RAISED
DURING ORAL CROSS-EXAMINATION OF WITNESS DAY**

Tr. V1/269 and 301 Please provide a date on which the Postal Service will provide the POSTPlan customer survey and instructional memorandum to the Commission.

RESPONSE

The Postal Service intends to file with the Commission a draft of the customer survey by Tuesday, July 31, 2012 and a draft of the instructional memorandum by Friday, August 10, 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO QUESTIONS RAISED
DURING ORAL CROSS-EXAMINATION OF WITNESS DAY**

Tr. V1/309 Is the Postal Service able to provide the average salaries, by EAS level, for current OIC or PMRs acting in POSTPlan Offices?

RESPONSE

The Postal Service is unable to provide the requested information. The Postal Service maintains salary and benefit data based on employee grade level, not based on employee assignment. The salary and benefit data is not linked to the Post Office or facility in which the employee is acting. For example, the data provided in USPS-LR-N2012-2/6 represents the salary and benefit information for all EAS Level 16 and below Postmasters, not the salary and benefit information for all Postmasters working in EAS Level 16 and below Post Offices.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO QUESTIONS RAISED
DURING ORAL CROSS-EXAMINATION OF WITNESS DAY**

Tr. V1/304-5 and 323 Please explain the discrepancy between column W in Library Reference 1 and column I in Library Reference 2 (2011_CSV_Data).

RESPONSE

Please see the errata to the response to POIR No. 4, Question 5, filed concurrently. The response to POIR No. 4, Question 5 contained an error in that column W of USPS-LR-N2012-2/1 does not correspond with column I of 2011_CSV_Data.xls in USPS-LR-N2012-2/2. CSV does not include a calculation of Postmaster Admin time. As such, for offices using CSV, the Postmaster Admin time, column W on USPS-LR-N2012-2/1, will be 0. The Admin time in column I of 2011_CSV_Data.xls in USPS-LR-N2012-2/2 is included in the value of column X of USPS-LR-N2012-2/1.